

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

712 DEARBORN, LLC,)	
)	
Plaintiff,)	CASE NO. 07 C 7063
vs.)	
)	Judge Nordberg
CARPENTERS LOCAL UNION NO. 1)	
)	Magistrate Judge Ashman
Defendant.)	

LOCAL RULE 37.2 STATEMENT OF COUNSEL

I, Terrance B. McGann, pursuant to Local Rule 37.2 hereby represent that on May 5, 2008 I telephoned the plaintiff's counsel, John Riccione, and in that telephone conference attempted to obtain:

1. Plaintiff's Answers to Defendants First Request for Production of Documents which had been propounded upon Plaintiff on March 11, 2008.
2. Plaintiff's Answers to Interrogatories which had been propounded upon Plaintiff on March 11, 2008.
3. A date for when Mr. Riccione would produce Mr. Faham for his deposition.
4. A date when Mr. Riccione would be available for the deposition of Ms. Elliott.

By virtue of an agreement between the parties, the plaintiff's response to defendants request for production of documents was due on or before May 10, 2008. By virtue of the same agreement, plaintiff's answers to interrogatories were also due on May 10, 2008. To date plaintiff has not responded to the Rule 34 request to produce documents, nor answered the Rule 33 interrogatories, nor given dates for Mr. Faham's deposition.

Due to no fault of the undersigned counsel, it appears that defendant will not obtain discovery without the assistance of the court and accordingly in good faith defendant's counsel

files this statement pursuant to Local Rule 37.2 and seeks the assistance of the Court in compelling discovery.

Respectfully submitted,

/s/ Terrance B. McGann
One of the attorneys for Plaintiffs

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